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Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

**RE: Section 64.2009(e) CPNI Certification Filing
EB-08-TC-5313
Request for Waiver**

Dear Ms. Dortch:

Security Master, Inc. (Security Master), by its attorneys, hereby submits its annual CPNI Certification for 2007, and a request for a waiver of section 64.2009(e) of the Commission's rules.

For the reasons set forth in its response to the FCC's CPNI Inquiry dated September 5, 2008 (File No. EB-08-TC-5313), which is incorporated herein as if fully set forth, Security Master hereby requests a waiver of Rule Section 64.2009(e) to permit the late-filing of the instant report. For good cause shown, it is respectfully submitted that the public interest would be served by a grant of this request.

In other instances, the Commission has granted waivers to allow the late filing of required documents when the public interest is served by allowing such filings. See, e.g., *In the matter of Forty-one Late-Filed Applications for Renewal of Educational Broadcast Service Stations*, DA 07-205, 22 FCC Rcd 879, (Jan. 25, 2007); *Junior College District of Metropolitan Kansas City, Missouri*, DA 06-2381, 21 FCC Rcd 13770 (WTB 2006); *City Page & Cellular Services, Inc.*

d/b/a City Beepers, DA 02-3558, 17 FCC Rcd 26109 (WTB 2002)(Long form application deadline waived because applicants were unaware of deadline); *NPCR, Inc., Petition for Waiver of Rule Section 54.8026*, DA 07-110, 22 FCC Rcd 560, (WCB 2007)(ETC Certification report deadline waived).

If you have any questions regarding this matter, please contact me.

Respectfully submitted,

/s/ Mary J. Sisak

Attorney for
Security Master, Inc.

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

Annual 47 C.F.R. § 64.2009(e) CPNI Certification
EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2007

Date of execution: **September 23, 2008**

Name of Company covered by this certification: **Security-Master, Inc.**

Form 499 Filer ID: **822004**

Name of Officer signing: **Connie L. Busby**

Title of Officer signing: **Treasurer**

I, **Connie L. Busby**, certify that I am an officer of the Company named above, and acting as an agent of the Company, that I have personal knowledge that the Company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See 47 C.F.R. § 64.2001 et seq.*

Attached to this certification as Exhibit 1 is an accompanying statement explaining how the Company's procedures ensure that the Company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

The Company **has not** taken any actions (proceedings instituted or petitions filed by a company at either state commission, the court system, or at the Commission against data brokers) against data brokers in the past year. Companies must report on any information that they have with respect to the processes pretexters are using to attempt to access CPNI, and what steps companies are taking to protect CPNI.

The Company **has not** received any customer complaints in the past year concerning the unauthorized release of CPNI (number of customer complaints a company has received related to unauthorized access to CPNI, or unauthorized disclosure of CPNI, broken down by category or complaint, *e.g.*, instances of improper access by employees, instances of improper disclosure to individuals not authorized to receive the information, or instances of improper access to online information by individuals not authorized to view the information).

Signed


Connie L. Busby, Treasurer

cc: Telecommunications Consumers Division, Enforcement Bureau
Best Copy and Printing, Inc.

Exhibit 1

Security-Master, Inc.

**STATEMENT EXPLAINING HOW THE COMPANY'S OPERATING PROCEDURES
ENSURE COMPLIANCE WITH THE FCC'S CPNI RULES**

I. Customer Proprietary Network Information ("CPNI")

CPNI is defined in Section 222(f) of the Communications Act as (A) information that relates to the quantity, technical configuration, type, destination, and amount of use of a telecommunications service subscribed to by any customer of a telecommunications carrier, and that is made available to the carrier by the customer solely by virtue of the carrier-customer relationship; and (B) information contained in the bills pertaining to telephone exchange service or telephone toll service received by a customer of a carrier (except that CPNI does not include subscriber list information).

Generally, CPNI includes personal information regarding a consumer's use of his or her telecommunications services. CPNI encompasses information such as: (a) the telephone numbers called by a consumer; (b) the telephone numbers calling a customer; (c) the time, location and duration of a consumer's outbound and inbound phone calls, and (d) the telecommunications and information services purchased by a consumer.

Call detail information (also known as "call records") is a category of CPNI that is particularly sensitive from a privacy standpoint and that is sought by pretexters, hackers and other unauthorized entities for illegitimate purposes. Call detail includes any information that pertains to the transmission of a specific telephone call, including the number called (for outbound calls), the number from which the call was placed (for inbound calls), and the date, time, location and/or duration of the call (for all calls).

The only CPNI that the Company has access to is solely the type of pager service being purchased by the customer. Absolutely no detail call information is handled by the Company.

II. Use and Disclosure of CPNI Is Restricted

The Company recognizes that CPNI includes information that is personal and individually identifiable, and that privacy concerns have led Congress and the FCC to impose restrictions upon its use and disclosure, and upon the provision of access to it by individuals or entities inside and outside the Company.

The Company has designated a CPNI Compliance Officer who is responsible for: (1) communicating with the Company's attorneys and/or consultants regarding CPNI responsibilities, requirements and restrictions; (2) supervising the training of Company employees and agents who use or have access to CPNI; (3) supervising the use, disclosure, distribution or access to the Company's CPNI by independent contractors and joint venture

partners; (4) maintaining records regarding the use of CPNI in marketing campaigns; and (5) receiving, reviewing and resolving questions or issues regarding use, disclosure, distribution or provision of access to CPNI.

Company employees and agents that may deal with CPNI have been informed that there are substantial federal restrictions upon CPNI use, distribution and access. In order to be authorized to use or access the Company's CPNI, employees and agents must receive training with respect to the requirements of Section 222 of the Communications Act and the FCC's CPNI Rules (Subpart U of Part 64 of the FCC Rules).

Before an agent, independent contractor or joint venture partner may receive or be allowed to access or use the Company's CPNI, the agent's, independent contractor's or joint venture partner's agreement with the Company must contain provisions (or the Company and the agent, independent contractor or joint venture partner must enter into an additional confidentiality agreement which provides) that: (a) the agent, independent contractor or joint venture partner may use the CPNI only for the purpose for which the CPNI has been provided; (b) the agent, independent contractor or joint venture partner may not disclose or distribute the CPNI to, or allow access to the CPNI by, any other party (unless the agent, independent contractor or joint venture partner is expressly and specifically required to do so by a court order); and (c) the agent, independent contractor or joint venture partner must implement appropriate and specific safeguards acceptable to the Company to ensure the confidentiality of the Company's CPNI.

III. Protection of CPNI

The only CPNI that the Company has access to is solely related to the type of pager service being purchased by the customer.

1. Due to the limited number of customers and the limited amount of CPNI that the Company handles, the Company restricts disclosure of CPNI to in-person requests, properly authenticated by the customer presenting a valid photo ID which matches the name on the account. The Company will not accept a written request nor an in-bound telephone request to release CPNI.

2. The Company will provide a customer's phone records or other CPNI to a law enforcement agency in accordance with applicable legal requirements.

3. Intentionally Omitted.

4. Intentionally Omitted.

5. The Company has adopted a policy that it does not and will not use, disclose or permit access to CPNI by an affiliate.

6. When an existing customer calls the Company to inquire about or order new, additional or modified services (in-bound marketing), the Company may use the customer's CPNI other than call detail CPNI to assist the customer for the duration of the customer's call if the Company provides the customer with the oral notice required by Sections 64.2008(c) and 64.2008(f) of the FCC's Rules and after the Company authenticates the customer.

The Company does not possess any call detail information on any of its customers. Further, the Company prohibits the disclosure or release of any CPNI during a customer-initiated telephone call.

7. The Company has adopted a policy that it does not and will not use, disclose, or permit access to CPNI in connection with Company-initiated marketing of services to which a customer does not already subscribe from the Company (out-bound marketing).

8. The Company does not utilize a customer's CPNI for any out-bound marketing activities or campaigns.

9. Before a customer's CPNI can be used in an out-bound marketing activity or campaign, the Company's records must be checked to determine the status of the customer's CPNI approval. Company employees, independent contractors and joint venture partners are required to notify the CPNI Compliance Officer of any access, accuracy or security problems they encounter with respect to these records.

If new, additional or extended approvals are necessary, the CPNI Compliance Officer will determine whether the Company's "Opt-Out CPNI Notice" or "Opt-In CPNI Notice" must be used with respect to various proposed out-bound marketing activities.

10. Intentionally Omitted.

11. The Company's employees and billing agents may use CPNI to initiate, render, bill and collect for telecommunications services. The Company may obtain information from new or existing customers that may constitute CPNI as part of applications or requests for new, additional or modified services, and its employees and agents may use such customer information (without further customer approval) to initiate and provide the services. Likewise, the Company's employees and billing agents may use customer service and calling records (without customer approval): (a) to bill customers for services rendered to them; (b) to investigate and resolve disputes with customers regarding their bills; and (c) to pursue legal, arbitration, or other processes to collect late or unpaid bills from customers.

12. The Company's employees and agents may use CPNI without customer approval to protect the Company's rights or property, and to protect users and other carriers from fraudulent, abusive or illegal use of (or subscription to) the telecommunications service from which the CPNI is derived. Because allegations and investigations of fraud, abuse and illegal use constitute very sensitive matters, any access, use, disclosure or distribution of CPNI

pursuant to this Section must be expressly approved in advance and in writing by the Company's CPNI Compliance Officer.

13. The Company's employees, agents, independent contractors and joint venture partners may **NOT** use CPNI to identify or track customers who have made calls to, or received calls from, competing carriers. Nor may the Company's employees, agents, independent contractors or joint venture partners use or disclose CPNI for personal reasons or profit.

14. Company policy mandates that files containing CPNI be maintained in a secure manner such that they cannot be used, accessed, disclosed or distributed by unauthorized individuals or in an unauthorized manner.

15. Paper files containing CPNI are kept in secure areas, and may not be used, removed, or copied in an unauthorized manner.

16. Company employees, agents, independent contractors and joint venture partners are required to notify the CPNI Compliance Officer of any access or security problems they encounter with respect to files containing CPNI.

17. To protect a customer's CPNI, the Company does not permit its customers to access any CPNI through his or her online account.

18. Intentionally Omitted.

19. Where applicable, at any time since December 8, 2007, the Company will notify customers immediately of certain changes in their accounts that may affect privacy or security matters.

a. The types of changes that require immediate notification include: (a) change or request for change of the customer's password; (b) change or request for change of the customer's address of record; (c) change or request for change of any significant element of the customer's online account; and (d) a change or request for change to the customer's responses with respect to the back-up means of authentication for lost or forgotten passwords.

b. The notice may be provided by: (a) a Company call or voicemail to the customer's telephone number of record; (b) a Company text message to the customer's telephone number of record; or (c) a written notice mailed to the customer's address of record (to the customer's prior address of record if the change includes a change in the customer's address of record).

c. The notice must identify only the general type of change and must not reveal the changed information.

d. The Company employee or agent sending the notice must prepare and furnish to the CPNI Compliance Officer a memorandum containing: (a) the name, address of record,

and telephone number of record of the customer notified; (b) a copy or the exact wording of the text message, written notice, telephone message or voicemail message comprising the notice; and (c) the date and time that the notice was sent.

20. Since December 8, 2007, the Company must provide an initial notice to law enforcement and a subsequent notice to the customer if a security breach results in the disclosure of the customer's CPNI to a third party without the customer's authorization.

a. As soon as practicable (and in no event more than seven (7) days) after the Company discovers that a person (without authorization or exceeding authorization) has intentionally gained access to, used or disclosed CPNI, the Company must provide electronic notification of such breach to the United States Secret Service and to the Federal Bureau of Investigation via a central reporting facility accessed through a link maintained by the FCC at <http://www.fcc.gov/eb/cpni>.

21. Since December 8, 2007, the Company will provide customers with access to CPNI at its retail locations if the customer presents a valid photo ID and the valid photo ID matches the name on the account.

22. Since December 8, 2007, the Company takes reasonable measures to discover and protect against activity that is indicative of pretexting including requiring Company employees, agents, independent contractors and joint venture partners to notify the CPNI Compliance Officer immediately by voice, voicemail or email of: (a) any suspicious or unusual call requesting a customer's call detail information or other CPNI (including a call where the caller furnishes an incorrect password or incorrect answer to one or both of the "shared secret" question-answer combinations); (b) any suspicious or unusual attempt by an individual to change a customer's password or account information (including providing inadequate or inappropriate identification or incorrect "address or record," "telephone number of record" or other significant service information); (c) any and all discovered instances where access to the Company's electronic files or databases containing passwords or CPNI was denied due to the provision of incorrect logins and/or passwords; and (d) any complaint by a customer of unauthorized or inappropriate use or disclosure of his or her CPNI. The CPNI Compliance Officer will request further information in writing, and investigate or supervise the investigation of, any incident or group of incidents that reasonably appear to entail pretexting.

IV. CPNI Compliance Officer

In addition to the specific matters required to be reviewed and approved by the Company's CPNI Compliance Officer, employees and agents, independent contractors and joint venture partners are strongly encouraged to bring any and all other questions, issues or uncertainties regarding the use, disclosure, or access to CPNI to the attention of the Company's CPNI Compliance Officer for appropriate investigation, review and guidance. The extent to which a particular employee or agent brought a CPNI matter to the attention of the CPNI Compliance Officer and received appropriate guidance is a material consideration in any disciplinary action brought against the employee or agent for impermissible use, disclosure or access to CPNI.

V. Disciplinary Procedures

The Company has informed its employees and agents, independent contractors and joint venture partners that it considers compliance with the Communications Act and FCC Rules regarding the use, disclosure, and access to CPNI to be very important.

Violation by Company employees or agents of such CPNI requirements will lead to disciplinary action (including remedial training, reprimands, unfavorable performance reviews, probation, and termination), depending upon the circumstances of the violation (including the severity of the violation, whether the violation was a first time or repeat violation, whether appropriate guidance was sought or received from the CPNI Compliance Officer, and the extent to which the violation was or was not deliberate or malicious).

Violation by Company independent contractors or joint venture partners of such CPNI requirements will lead to prompt disciplinary action (up to and including remedial training and termination of the contract).

Exhibit 2

Security-Master, Inc.

STATEMENT OF ACTIONS TAKEN AGAINST DATA BROKERS

- A. During Calendar Year 2007, the Company has instituted the following proceeding, or filed the following petitions, against data brokers before the Federal Communications Commission:

NONE

- B. During Calendar Year 2007, the Company has instituted the following proceeding, or filed the following petitions, against data brokers before the **Illinois Commerce Commission**.

NONE

- C. During Calendar Year 2007, the Company has instituted the following proceeding, or filed the following petitions, against data brokers before the following federal or state courts:

NONE

Exhibit 3

Security-Master, Inc.

**SUMMARY OF CUSTOMER COMPLAINTS
REGARDING UNAUTHORIZED RELEASE OF CPNI**

- A. During Calendar Year 2007, the Company has received the following number of customer complaints related to unauthorized access to, or disclosure of, CPNI due to improper access by Company employees:

NONE

- B. During Calendar Year 2007, the Company has received the following number of customer complaints related to unauthorized access to, or disclosure of, CPNI due to improper disclosure to individuals not authorized to receive the information:

NONE

- C. During Calendar Year 2007, the Company has received the following number of customer complaints related to unauthorized access to, or disclosure of, CPNI due to improper access to online information by individuals not authorized to view the information:

NONE

- D. During Calendar Year 2007, the Company has become aware of the following processes that pretexters are using to attempt to access its CPNI:

NONE